

1 Katherine T. Corrigan, SBN 132226
2 CORRIGAN WELBOURN & STOKKE,
3 A PROFESSIONAL LAW CORPORATION
4 4100 Newport Place, Suite 550
5 Newport Beach, CA 92660
6 Telephone: 949-251-0330
7 Facsimile: 949-251-1181
8 E-Mail: kate@cwsdefense.com
9 Attorney for Defendant, CHANCE BRANNON

10 UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
12 SOUTHERN DIVISION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 vs.

16 CHANCE BRANNON,

17 Defendant

Case: 8:23-CR-00100-CJC

DEFENDANT'S SUPPLEMENT TO
SENTENCING POSITION;
EXHIBITS G-H

Sentencing Date: April 15, 2024
Hearing Time: 9:00 a.m.

18 **TO THE HONORABLE CORMAC J. CARNEY, UNITED STATES**
19 **DISTRICT JUDGE, THE UNITED STATES ATTORNEY'S OFFICE AND**
20 **ITS ATTORNEYS OF RECORD, KATHRYNNE SEIDEN, AND UNITED**
21 **STATES PROBATION OFFICER JILL DACOSTA:**

22 Defendant CHANCE BRANNON (hereinafter the "*Defendant*"), by and
23 through counsel of record, Katherine Corrigan, hereby files Defendant's supplement to
24 his Position Re Sentencing (Exhibit G – proof of payment of restitution and Exhibit H
25 – 2 additional letters of support) in the above-entitled matter.

26 DATED: April 11, 2024

_____/s/_____
Katherine Corrigan
Attorney for Defendant

I.

INTRODUCTION

Defendant respectfully submits this additional memorandum to provide information to assist the Court in fashioning a sentence “sufficient but not greater than necessary” to achieve the statutory purposes of punishment, as required by 18 U.S.C. Section 3553(a) in light of *United States v. Booker*, 125 U.S. 738 (2005).

This supplement is filed for the purpose of providing the Court with 2 additional letters of support and proof of payment of restitution in full. The letters provide the Court with additional insight into the Defendant’s view of his actions, his reflection on his actions and his acceptance of responsibility. The letters also provide further verification of Defendant’s mental health challenges, and good character traits.

After full analysis of the sentencing factors in this case, the information provided by the defense and probation, the Defendant requests that the Court impose the following sentence and make the following recommendations:

1. No more than 60 months imprisonment
2. 3-year supervised release
3. Imposition of no fine
4. Imposition of a \$325 special assessment
5. The conditions of supervised release articulated in the sentencing recommendation letter found at Docket entry 88
6. A recommendation the Bureau of Prisons house Defendant FCI Englewood (Colorado) due to services it makes available to veterans.

DATED: April 11, 2024

Respectfully submitted,

_____/s/_____
Katherine Corrigan

CERTIFICATE OF SERVICE

I, Katherine Corrigan, declare:

That I am a citizen of the United States and resident or employed in Orange County, California; that my business address is Corrigan Welbourn & Stokke, APLC, 4100 Newport Place, Suite 550, Newport Beach, California 92660; that I am over the age of eighteen years, and am not a party to the above-entitled action;

That on ***April 11, 2024***, I caused to be transmitted via facsimile or e-mail to the person(s) below and addressed as follows:

DEFENDANT'S SUPPLEMENT TO SENTENCING POSITION; EXHIBITS G-H
on the following persons:

Jill DaCosta, USPO Via E-Mail Jill_DaCosta@cacp.uscourts.gov
United States Probation and Pretrial Services Office
Santa Ana, CA

AUSA Kathrynne Seiden Via email Kathrynne.Seiden@usdoj.gov
United States Attorney's Office
312 N. Spring St.
Los Angeles, CA 90012

This Certificate is executed on ***April 11, 2024*** at Newport Beach, California. I certify under penalty of perjury that the foregoing is true and correct.

Dated: April 11, 2024

_____/s/_____
Katherine Corrigan

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EXHIBIT G

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Page 1/1



U.S. District Court

Deliberate Criminal Justice Unit

Chance Brannon

Receipt Date: Apr 5, 2024 2:22PM

Pay to Order: DCACB23CR000100 / 001 Total Due: \$1,000.00 Case ID: 2023-001

CD	Purpose	Case/Party/Defendant	Qty	Price	Amnt
700	Criminal Debt	DCACB23CR000100 / 001 Chance Brannon FBO: Chance Brannon	1	\$1000.00	\$1000.00

CD	Tender	Amnt
CA	Cash	\$1,000.00
Total Due Prior to Payment		\$1,000.00
Total Tendered		\$1,000.00
Total Cash Received		\$1,000.00
Cash Change Payment		\$0.00

Only when the Court orders the Clerk, or any other, to withhold or deduct fees, is the Court debt actually paid or discharged. A \$53 fee will be charged for a returned check.

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EXHIBIT H

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From: Laurie Aitken [REDACTED]
Date: April 11, 2024 at 9:51:13 AM PDT
To: Kate Corrigan <kate@cwsdefense.com>
Subject: Re: Chance Brannon

To whom it may concern:

We have been close friends and neighbors of the Crosby/Brannon family for decades. We have known Chance Brannon since the day he was born. We raised our children together and consider Chance a member of our family.

We have spent holidays and vacations together. We have shared sporting activities, schooling, carpooling and our daily lives with each other since our kids were babies.

We were shocked and saddened to hear about the charges against Chance because it is so out of character for him.

He has always been the first one over to the house to help with any situation... Whether it is a medical problem with one of the children, a car accident, a missing pet, or even the simplest thing as helping me get my Christmas tree inside of the house. He has always been so responsible, kind and loving.

I was worried when he joined the Marines, but he assured me it was the right thing for him so we supported him.

We were very proud of how well he served his country and how hard he worked.

We are not sure what led to the incidents that he is currently in jail for... But we can tell you that it is completely out of character. We believe that with the proper care, guidance and support which he has from his family and friends he can come out of this a better, more informed and compassionate human being than he went in.

He has so much to offer the world and given a second chance we have every hope and belief that he he will use this as a learning tool be able to help others who are struggling in the same situation he was in. His character has always been to help others wherever and whenever they need it.

We ask for the court to show compassion and leniency in his sentencing.

Thank you for your time

Sincerely,

Laurie and Darren Aitken

Thank you for taking the time to read this letter. My name is Deborah Brannon. I am Chance Michael Brannon's aunt. I have known Chance since his first breath in this world. My boys Calvin (25) and Zachary (21) grew up with Chance. Needless to say, we were shocked upon hearing about Chance's charges. I have come to accept Chance's decision to do what he thought at the time was a choice to make a positive change in society, I see in his eyes and demeanor the guilt and shame he has caused his family and himself. Ever since Chance was young, he wanted to be a Marine. He would emulate his older cousins and supported them when they were overseas in Afghanistan. The day Chance turned 18 he took his passport and enlisted. He was a proud Marine. At an early age Chance was diagnosed with Aspergers, or high functioning Autism. He was extremely intelligent but his social cues were lacking. Once we were all educated on the way Chance viewed things we adapted to Chance's needs and he learned how to deal with life's social cues. Briefly, Chance sees things in black and white, right and wrong. The Marines provided the structure that guided Chance into a proud and responsible young man. Unfortunately, all of his influences during this time were not in a positive way. Seeing him behind a glass partition and only communicating through a phone has taken a toll on him. I truly believe Chance understands the actions he took for his beliefs were the wrong ones. Please take into consideration the support Chance has from his family and the consequences of long term incarceration will have on him.

Thank you,

Deborah Brannon, RN, BSN